

Allnet Communication Services, Inc.
Public Policy and Government Affairs
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Roy L. Morris
Director

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FILE

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AUG 20 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Main Offices:
30300 Telegraph Road
Bingham Farms, Michigan 48025-4510

August 20, 1992

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AUG 20 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

**Subject: Open Network Architecture Tariffs of the BOCs, CC Docket No. 92-91;
Commission Requirements for Cost Support Material to be Filed with
Open Network Architecture Access Tariffs (DA 92-129)**

Dear Ms. Searcy:

With regret, I am forced to write to the Commission to explain that Bellcore continues to withhold the SCIS Redaction II from Allnet. This correspondence is necessitated by misstatements made in the August 11, 1992 letter of Mr. Britt, Bellcore to Stan Wiggins, FCC. [Attachment I, herein] That letter attempts to mislead the Commission by claiming that Allnet has not "contacted Bellcore to confirm arrangements" to review the Redaction II Software. Letter of Mr. Britt, Bellcore to Stan Wiggins, FCC, dated August 11, 1992. The letter has left out a few key facts, which expose its falsehood. In fact, Allnet has written two letters to Mr. Britt asking him to forward copies of Redaction II to Allnet.

Although not obligated to do so under the rules laid out by the Bureau, Allnet has previously voluntarily returned the SCIS Redaction I software to Bellcore, thus, overcoming any substantive objections to forwarding the new material. [See, Attachment II, herein] It should be noted, however, that Bellcore has conceded that no trade secret and/or confidential information is contained in Redaction I -- thus, no vendor or Bellcore interest exists in the limited information that was exposed in Redaction I. See, Letter of James Britt (Bellcore) and Anna Lim (US West) to John Cimko, FCC, dated April 3, 1992 [Attachment III, herein] -- thus, the return of the highly redacted SCIS software (which Allnet did long ago) is a frivolous pre-condition to having access to Redaction II software. Similarly, given that Redaction II documentation is only a superset of the Redaction I documentation, it does not make any sense that the return of the highly redacted Redaction I documentation be required to obtain a copy of Redaction II documentation. Yet, Bellcore continues to refuse to forward copies of the Redaction II version.

Bellcore and US West have taken control of the ONA investigation by determining what each party should and should not see under confidentiality

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2+4

agreements. We urge that the Commission make a finding as to what the Bell Operating Companies are required to produce for all parties without any further delay.

Respectfully,

Roy L. Morris

cc: All parties of Record

Attachment I:

August 11, 1992 Britt Letter

Bellcore

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James F. Britt
Executive DirectorLCC 2E-243
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039 USA
201-740-4810
201-740-4916
FAX No. 201-740-6897

August 11, 1992

Mr. Stan Wiggins
Senior Attorney, Tariff Division
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554**RECEIVED****AUG 20 1992**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYSUBJECT: Commission Requirements for Cost Support Material to be Filed
with Open Network Architecture Access Tariffs (DA 92-129)

Dear Mr. Wiggins:

The following is for purposes of advising the Bureau that the SCIS Redaction II review schedule, appended to my July 31, 1992 notice addressed to Ms. Cheryl Tritt, has been amended. The revised schedule, attached hereto, was developed in order to accommodate various concerns, issues and scheduling conflicts brought to my attention by several parties to the ONA proceeding.

The attached schedule can not be considered final inasmuch as, several parties have not contacted Bellcore to confirm arrangements (Allnet, MetroMedia). However, in view of our resource limitations, Bellcore must terminate the SCIS Redaction II software access program effective September 14, 1992.

All parties on the attached service list have been sent, via fax, a copy of this SCIS Redaction II Schedule Revision Notice.

Respectfully submitted,
Bell Communications Research

By


James F. Britt
Executive Director

Attachments

Copy (w/Atts.) to
C. Tritt
M. Brown
S. Spaeth

Attachment II:

**Allnet Letter of Second Request for Redaction II
With Return of Redaction I Software**

Allnet Communication Services, Inc.
Public Policy and Government Affairs
1990 M Street, NW Suite 500
Washington, D.C. 20036
(202) 293-0593



Roy L. Morris
Director, and
Deputy General
Counsel

Main Offices:
30300 Telegraph Road
Bingham Farms, Michigan 48025-4510

July 24, 1992

Mr. James F. Britt
Executive Director
BellCore
Subidiary of the Bell
Operating Companies
LCC 2E-243
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039

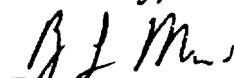
(via Overnight)

Dear Mr. Britt:

After speaking with Mr. Stan Wiggins of the FCC, today, he explained that the only Bellcore concern that the FCC was aware of regarding persons receiving "Redaction II" is that there is a belief that Radaction I software could somehow be used with Redaction II software to know more than if a person had only one of these in their possessions. I stated that I was willing to return the Redaction I software. This overcomes any known concerns that Bellcore has expressed to the Commission. Attached is a photocopy of the labels of the disks that have been returned. They include all disks that we have received from Bellcore.

Please overnight the Redaction II material without any further delay.¹

Sincerely,


Roy L. Morris

cc: Mary Brown
Stan Wiggins
Steve Spaeth

¹Although I called you today to discuss this matter, you have not, as of close of business, returned my call.

Bellcore

SCIS Rel 5.0.1
Bell Atlantic
Model Office Studies

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BellSouth
Model Office Studies

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MAXELL
SUPER RD
MF2
HIGH DENSITY
5 1/4 INCH
DISKETTES

Bellcore

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Attachment III:

**Letter of James Britt and Anna Lim
Explaining That No Trade Secret and/or
Confidential Data Is Contained In Redaction I**

Belcore

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James F. Britt
Executive Director

April 3, 1992

LCC 2E-243
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Mr. John Cimko, Chief
Tariff Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Cimko:

We have recently reviewed several Ex Parte letters stating that the Switching Cost Information System (SCIS) and the Switching Cost Module (SCM) redactions performed by Bellcore and U S WEST, respectively, pursuant to the SCIS Disclosure Order, were excessive. Clearly, the intervenors in this proceeding expected more from the redacted material than is possible given the proprietary nature of the models and the information contained therein. Inasmuch as, it was recognized early on that the redacted material would not be suitable for certain analyses, Bellcore and U S WEST, with the cooperation of Arthur Andersen, had proposed that steps be taken by Arthur Andersen to ensure that all parties to this proceeding be given adequate insight into the SCIS and SCM models.

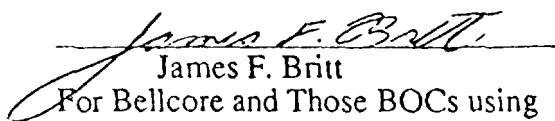
The redacted software and attendant documentation, while of limited value for certain analyses, is useful to: 1) evaluate the conceptual framework of the SCIS and SCM models; 2) achieve a basic understanding of the processes and procedures contained within the models and 3) analyze the reasonableness of the BOC input data and the various "run" options that the models provide. However, the ability of intervenors to perform detailed and accurate sensitivity analyses using the redacted software is not feasible, nor would a less redacted or modified public version of the software afford that ability. Indeed, this capability could only be provided if the intervenors were given access to Trade Secret and/or proprietary data. This is not possible. }←

Accordingly, Arthur Andersen was directed to perform extensive sensitivity analyses as an integral part of its examination into SCIS and SCM. Moreover, Arthur Andersen, in its report filed with the Commission on March 5, 1992, not only stated that it would perform these analyses (page 6, Phase II), but notified all concerned that it would submit a non-proprietary final report of its findings for public inspection. This public report will provide interested parties with detailed information pertaining to those options, values and/or inputs that have a "significant" effect on the BSE rate development process, as well as a quantification of the order of magnitude effects that each variable has on the results.¹ In order to address the concerns expressed by various parties to this proceeding, I recently requested Arthur Andersen to describe in more detail the nature of the sensitivity analyses which would be performed, as well as to provide illustrations as to the scope of the findings that would be included in their public report. The Arthur Andersen letter of explanation is attached hereto.

Since the Arthur Andersen analyses and attendant report will be comprehensive, and since the parties of record will not only have input as to the analyses (i.e., queries) performed,

but can comment on the data content and format for the public report to be submitted, we submit that the process established by the Bureau for resolution of this matter is both fair and equitable. Indeed, the Bureau in ordering the independent audit, intervenor review of redacted material and intervenor participation in the audit process, coupled with the Bureau's own in camera review, has ensured that the SCIS and SCM models will be thoroughly evaluated, beyond what is required under Commission rules. Assertions that the redaction process needs to be modified, or an alternative procedure established would serve no useful purpose other than to delay, or impede the review process.

Sincerely,


James F. Britt
For Bellcore and Those BOCs using
SCIS in the ONA Access Tariff
Proceeding

and


Anna Lim
Attorney for U S WEST Communications

Attachment (See list continued on next page)

cc (w/attachment) to: Stanley P. Wiggins, Jr.
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J. Bogy, Pacific Bell
P. Garber, Nevada Bell
D. Haraldson, Telesector Resources Group
J. M. Lee, Bell Atlantic
H. Shockey, BellSouth Telecommunications, Inc.
T. Pajda, Southwestern Bell
L. Blosser, MCI Telecommunications Corp.
R. Morris, Allnet Communications Services, Inc.
R. Wiley, American Newspapers Publishers Association\
and Competitive Telecommunications Association
F. Berry, American Telephone & Telegraph
D. Avery, D.C. Public Service Commission
M. Ettner, General Services Administration
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